

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

In re:

STEPHANIE MAZLOOM,

Debtor

## Chapter 7

Case No. 18-60206-06-dd

In re:

ROBERT A. CRANDALL AND  
MOLLY S. CRANDALL,

## Debtors

## Chapter 13

Case No. 07-30439-5

Stephanie Mazloom, Robert A. Crandall and  
Molly S. Crandall, on behalf of themselves and  
all others similarly situated,

Plaintiffs,

V.

Navient Solutions, LLC and Navient Credit  
Finance Corporation,

Defendants.

Adv. Pro. No. 20-80033-6

Stephanie Mazloom,

Plaintiff-Appellant,

V.

Navient Solutions, LLC and Navient Credit  
Finance Corporation,

Defendants.

Case No. 23-cv-00437

## STIPULATION AND JOINT MOTION STAYING PROCEEDINGS

Plaintiffs Stephanie Mazloom, Robert A. Crandall, and Molly S. Crandall (collectively, “Plaintiffs”) and Defendants Navient Solutions, LLC and Navient Credit Finance Corporation (collectively, “Defendants” and with Plaintiffs, the “Parties”), by and through undersigned counsel, hereby file this stipulation and joint motion (this “Stipulation”) to stay the proceedings in the above-captioned matter.

In light of the settlement in principle in another case, *Woodard v. Navient Solutions, LLC*, Adv. Pro. No. 21-08023 (Bankr. D. Neb.), which would encompass all the claims raised between the parties in the above-captioned case, and to allow time for the *Woodard* parties to reduce the settlement in principle to a final definitive agreement and for the Parties to determine whether the above-captioned action should be maintained, the Parties agree and jointly move that all proceedings in the above-captioned matter be stayed for sixty (60) days.

**NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, THAT:**

1. The Parties hereby jointly move the Court to stay the proceedings in the above-captioned action for sixty (60) days.
2. The Parties shall report to the Court within sixty (60) days as to the status of the proposed settlement.

Dated: May 4, 2023  
Albany, New York

/s/ George F. Carpinello  
George F. Carpinello (Bar Roll # 103750)  
Adam R. Shaw  
Jenna C. Smith

/s/ Philip A. Goldstein  
Philip A. Goldstein (Bar Roll # 514834)  
McGuireWoods LLP  
1251 Avenue of the Americas, 20<sup>th</sup> Floor  
New York, New York 10020  
(212) 548-2100

BOIES SCHILLER FLEXNER LLP  
30 South Pearl Street, 11<sup>th</sup> Floor  
Albany, NY 12207  
(518) 434-0600  
gcarpinello@bsfllp.com  
ashaw@bsfllp.com  
jsmith@bsfllp.com

Jason W. Burge (admitted *pro hac vice*)  
SBN (LA) 30420  
Lara Richards (to be admitted *pro hac vice*)  
SBN (LA) 34054

FISHMAN HAYGOOD LLP  
201 St. Charles Avenue, 46th Floor  
New Orleans, Louisiana 70170-4600  
(504) 586-5252; (504) 586-5250 fax  
jburge@fishmanhaygood.com  
lrichards@fishmanhaygood.com

Lynn E. Swanson  
(admitted *pro hac vice*)  
Lindsay E. Reeves  
(to be admitted *pro hac vice*)

JONES SWANSON HUDDALL LLC  
601 Poydras Street, Suite 2655  
New Orleans, Louisiana 70130  
(504) 523-2500; (504) 523-2508  
lswanson@jonesswanson.com  
pfreiberg@jonesswanson.com  
lreeves@jonesswanson.com

*Counsel for Plaintiffs*

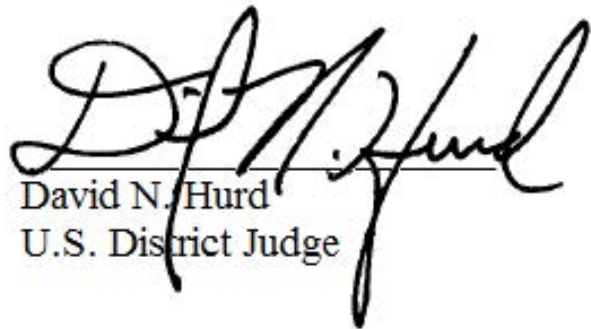
pagoldstein@mcguirewoods.com

Thomas M. Farrell (*pro hac vice*)  
McGuireWoods LLP  
JPMorgan Chase Tower  
600 Travis Street, Suite 7500  
Houston, TX 77002  
(713) 571-9191  
tfarrell@mcguirewoods.com

K. Elizabeth Sieg (*pro hac vice*)  
McGuireWoods LLP  
Gateway Plaza  
800 East Canal Street  
Richmond, Virginia 23219  
(804) 775-1000  
bsieg@mcguirewoods.com

*Counsel for Defendants*

IT IS SO ORDERED:



David N. Hurd  
U.S. District Judge

Dated: 05-05-2023 \_\_\_\_\_